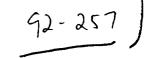OFFICE OF
GALVESTON-TEXAS CITY PILOTS
U. S. NATIONAL BANK BUILDING

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92-257

GALVESTON, TEXAS 77550

November 2, 1992

U. S. Federal Communications Commission
Attn: Mr. George Dillon, Chief Aviation-Marine Branch
2025 M St. NW, Room 5114
Washington, D. C. 20554

Dear Mr. Dillon:

On behalf of the Galveston-Texas City Pilots I am requesting your assistance in expanding the users of UHF Channel 77 in the ports of Galveston and Texas City to include operators of marine berths, line handlers and port authorities.

Channel 77 is limited in use to port operations. It is further restricted to use by pilots for ship to ship use and for docking operations. As pilots we direct the movement of very large ocean going vessels through the channels leading to the ports of Galveston and Texas City. Upon reaching port we manuever these vessels with the assistance of tug boats alongside marine berths. During the manuevers to bring these vessels alongside a marine berth, it is imperative that we have communication with all the entities involved to prevent any damage to the vessels or the environment. This communication is not presently possible because the FCC regulations prevent the issuance of licenses to use Channel 77 to any users other than pilots or tug boat pilots.

It has been suggested that we use another channel designated for port operations use. This is not feasible because 5 watt radios used by shore based stations are more powerful than the 1 watt walkie-talkies used by pilots and will blow the walkie-talkies off the air. If this happens during the critical docking manuever, disaster could result. For these reasons I request that the rules concerning the licensing of Channel 77 either be waived for the ports of Galveston and Texas City or changed to include all users involved in the docking of vessels. This would allow all concerned in the operation of our ports to communicate effectively and insure that our ports are operated as safely as possible.